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Attorneys for United States of America

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

UNITED STATES OF AMERICA,	)	CASE NO. CR 11-0573-JSW
Plaintiff,	)	
v.	)	UNITED STATES' OPPOSITION TO THE
	)	PANGANG DEFENDANTS' SECOND MOTION
	)	TO DISMISS AND PARTIAL MOTION TO
	)	STRIKE [DKT 1295]: SUPPLEMENTAL
PANGANG GROUP COMPANY, LTD.;	)	AUTHORITIES
PANGANG GROUP STEEL VANADIUM &	)	
TITANIUM COMPANY, LTD.; PANGANG	)	Date: January 14, 2022
GROUP TITANIUM INDUSTRY COMPANY,	)	Time: 9:00 AM
LTD; and PANGANG GROUP	)	Location: Courtroom 5, 2nd Floor
INTERNATIONAL ECONOMIC &	)	
TRADING COMPANY, LTD.,	)	
Defendants.	)	

1 The United States, by and through its undersigned attorney's, submits the following supplemental  
2 authorities pursuant to the Court's Order, dated January 12, 2022:

- 3
- 4 • *Petty v. Tennessee-Missouri Bridge Commission*, 359 U.S. 275, 276 (1956).
- 5 • *Clark v. Barnard*, 108 U.S. 436, 447 (1883).
- 6 • *The Sao Vicente*, 295 F. 829, 831 (3d. Cir. 1924).
- 7 • *Kunlig Jarnvagsstyrelsen v. Dexter & Carpenter*, 300 F. 891, 892-93 (S.D.N.Y. 1924) (J. Learned  
8 Hand).
- 9 • H. Rep. No. 1487, 94th Cong. 2d Sess. 18, reprinted in 1976, U.S.C.C.A.N. 6604, 6617.
- 10

11 Dated: January 13, 2021.

Respectfully submitted,

12 STEPHANIE M. HINDS  
13 United States Attorney

14 /s/ Colin Sampson  
15 COLIN C. SAMPSON  
16 Assistant United States Attorney  
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17 Trial Attorney, National Security Division  
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